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UNITED STATES MAGISTRATE COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE ANTHONY J. BATTAGLIA)

UNITED STATES OF AMERICA,)	Case No. 08cr01180-WQH
)	
Plaintiff,)	
)	
v.)	JOINT MOTION TO CONTINUE CHANGE OF
)	PLEA HEARING
)	
JUAN RICARDO FLORES-SUAREZ,)	
)	
)	
Defendant.)	
_____)	

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY;
DOUGLAS P. KEEHN, ASSISTANT UNITED STATES ATTORNEY:

IT IS HEREBY REQUESTED by the parties in the case, the defendant, Juan Ricardo Flores-Suarez, by and through his counsel, David M.C. Peterson, Esq., and plaintiff, United States of America, by and through its counsel, Karen P. Hewitt, United States Attorney, and Douglas Keehn, Assistant United States Attorney, and that the change of plea hearing in the above entitled case scheduled for Friday, April 24, 2008 at 1:30 p.m., be continued to Friday, May 1, 2008 at 1:30 p.m.

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Undersigned defense counsel called the court's judicial assistant to obtain the new motion hearing date. A proposed order with respect to this joint motion is being submitted directly to the court via efile_battaglia@casd.uscourts.gov.

CONCLUSION

Respectfully submitted,

Dated: April 22, 2008

/s/ David M.C. Peterson
DAVID M.C. PETERSON
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Haynes

Dated: April 22, 2008

/s/ Douglas Keehn
DOUGLAS KEEHN
Assistant United States Attorney

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CERTIFICATE OF SERVICE

Counsel for Defendant certifies that the foregoing is true and accurate to the best information and belief, and that a copy of the foregoing document has been caused to be delivered this day upon:

Courtesy Copy to Chambers

Copy to Assistant U.S. Attorney via ECF NEF

Copy to Defendant

Dated: April 22, 2008

/s/ DAVID M. PETERSON
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Flores-Suarez
david_peterson@fd.org (email)

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